



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

February 28, 2011

Holly Jewkes  
District Ranger  
Crescent Ranger District  
P.O. Box 208  
Crescent, Oregon 97733

Re: EPA Region 10 comments on the Final Environmental Impact Statement for the Three Trails Off-Highway Vehicle Project (EPA Project Number 09-006-AFS)

Dear Ms. Jewkes:

The U.S. Environmental Protection Agency (EPA) has reviewed the final Environmental Impact Statement (FEIS) for the Three Trails Off-Highway Vehicle Project on the Crescent Ranger District of the Deschutes National Forest, Klamath County, Oregon. Our review of the FEIS was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

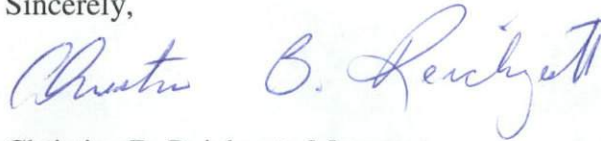
Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our Section 309 authority, our review of the FEIS considers the expected environmental impacts, and the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

The Three Trails FEIS identifies Alternative E as the preferred alternative. We appreciate the thoughtful approach taken by the District in crafting this alternative. We also appreciate the project design features, such as protection of fens and wetlands, which have been brought forward into the FEIS.

Our November 15, 2010 review of the DEIS identified a limited range of concerns focused principally on the scope of the proposed project, and a desire to ensure that the project would be sized appropriately for the amount of use it would receive. We appreciate the thorough treatment of these concerns in the FEIS. Although data are not available to be able to definitively say what the perfect number of miles would be for the trail system, the Forest Service has done an admirable job of collecting and using available data and applying screening criteria. We appreciate the additional discussion of each of these decision factors in the FEIS. We also appreciate that the project will be phased in based on use trends and restoration needs. By sequencing construction in this way, we anticipate that the Forest Service will be able to respond appropriately to user needs while protecting and restoring key resources.

Again, we appreciate the effort taken by the Forest Service to keep us informed about this project and address our concerns. We also appreciate this opportunity to provide comments on the Final EIS. I encourage you to contact me or Teresa Kubo of my staff with any questions at (503) 326-2859 or [kubo.teresa@epa.gov](mailto:kubo.teresa@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit